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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement the Commission's  
Procurement Incentive Framework and to Examine the  
Integration of Greenhouse Gas Emissions Standards into  
Procurement Policies.

Rulemaking 06-04-009  
(Filed April 13, 2006)

In the Matter of:

Docket 07-OIIP-01

AB 32 Implementation: Greenhouse Gases.

**COMMENTS  
OF  
SOUTHWEST GAS CORPORATION (U 905 G)  
ON TYPE AND POINT OF REGULATION ISSUES  
FOR NATURAL GAS UTILITIES**

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Dated: December 17, 2007

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Pursuant to the November 28, 2007 **ADMINISTRATIVE LAW JUDGES' RULING REQUESTING COMMENTS ON TYPE AND POINT OF REGULATION ISSUES FOR NATURAL GAS UTILITIES** (Ruling), Southwest Gas Corporation (Southwest) respectfully submits its Comments.

**INTRODUCTION**

On April 13, 2006, the California Public Utilities Commission (Commission) issued an order to implement the Commission's procurement incentive framework and to examine the integration of greenhouse gas (GHG) emissions standards into procurement policies. The California Energy Commission (CEC) opened a companion proceeding in Docket 07-OII-01 (collectively the Joint Commissions). Additionally, on May 24, 2007 an Order was set to modify the scope of this proceeding regarding consideration of GHG emissions policies for the natural gas sector. The natural gas inquiry was expanded to address GHG emissions associated with the transmission, storage, and distribution of natural gas in California, in addition to the combustion of natural gas by non-electricity generator end-use customers. This modification

was made to reflect provisions of Assembly Bill (AB) 32, which requires development of a statewide GHG emissions limit encompassing the entire California economy.

In response, the Commission has held a pre-hearing conference and requested comments from the natural gas sector. Most recently, the Administrative Law Judges (ALJs) of record issued a ruling on November 28, 2007, directing the parties to address questions to allow the Commission to evaluate GHG program design options and develop recommendations regarding a GHG regulatory approach.

Southwest hereby provides the following responses to selected questions posed in the ALJs' Ruling.

## **DISCUSSION**

Southwest has reviewed the questions listed in the Ruling. Because Southwest believes its comments cover more than one question, Southwest hereby submits its comments in reference to selected questions by section, rather than by individual question. Southwest's silence on any specific question or issue should not be taken as a lack of interest with respect thereto. Southwest is respectful of the ongoing nature of this proceeding and reserves the right to submit additional comments at a future time, if necessary.

### **3.1 *Market-based System***

It is Southwest's belief that there is no need for a Cap and Trade (C&T) system for the natural gas sector. Southwest sees little, if any, incremental benefits of a market-based system for GHG compliance in the natural gas sector, as the vast majority of emissions in this sector come from end-use customers' combustion of natural gas. The cost of C&T would be more costly to customers than simply requiring compliance through mandated energy efficiency measures. Additional emission savings should be obtained through more comprehensive and broader energy efficiency initiatives.

While a market-based system that includes a C&T program may be the most efficient and least costly alternative to achieve GHG emission reductions in the electric generation sector, the incremental benefits of a C&T program for the natural gas distribution sector are limited. Natural gas local distribution companies (LDCs) do not have the same opportunities as electric utilities to reduce GHG emissions, as they have no ability to substitute low carbon alternatives to natural gas. A key risk in designing a GHG compliance program for the natural gas sector is the unintended consequence of having customers shift away from natural gas and use more electricity, which may be counter-productive in terms of overall GHG emissions reduction goals. Not having a hard cap and/or a C&T program for natural gas distribution utilities would reduce the possibility of this occurring.

### **3.2 *Principles or Objectives to be Considered in Evaluating Design Options***

Southwest suggests that, in no particular order, goal attainment, cost minimization, administrative simplicity, and accuracy should be the major objectives considered when developing policies to achieve the GHG emissions goals set in AB 32. Cost minimization is an important goal for natural gas utilities, as the cost of compliance for a GHG reduction program would be fully recovered from its customers<sup>1</sup>. In addition a negative impact to natural gas customers would be higher natural gas costs, resulting from increased demand for natural gas (electric generation) to comply with GHG emission limits in the electric sector. It is commonly agreed that the overwhelming majority of the reductions in emissions for the natural gas sector will be met through energy efficiency and conservation measures implemented for end-users. Thus, GHG emission goals can be set by backing into the total energy savings needed to achieve the allocated emission reduction levels for the natural gas sector.

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<sup>1</sup> For regulated utilities a key credit rating consideration will be the allowed recovery of the economic cost of compliance for GHG reduction programs. Standard & Poor's Ratings Direct, "The Cost Of Potential Climate Change Laws And Its Effect On U.S. Utility Credit," May 11, 2007.

Southwest believes a workshop approach (a series of collaborative workshops among the parties in the natural gas sector) would assist in developing a simple but effective administrative process to achieve GHG reductions. This will assist in minimizing costs and will adequately provide the Joint Commissions and the Air Resources Board (ARB) with the level of data to accurately evaluate energy and emission savings. The combination of these objectives should strive to create a process which will achieve a high level of energy and emission savings in a cost-effective manner.

### ***3.3-5 Scope of GHG Regulation, Point of Regulation and Deferral of a Market-based Cap-and-Trade System, and Coordination with Other States***

Southwest believes that a C&T program would be ineffective in achieving additional GHG reductions beyond what will be achieved through expanded and comprehensive end-user energy efficiency programs. It is Southwest's view that subjecting natural gas utilities to C&T emissions regulation will provide little or no incentive for the reduction of GHG emissions in California. Recent inventory work conducted by Southwest indicates there is very little opportunity to reduce emissions from modern natural gas distribution systems. Nonetheless, Southwest is a member and supporter of Natural Gas STAR Program, a voluntary partnership between the Environmental Protection Agency and the oil and natural gas industry to identify and promote the implementation of cost-effective technologies and practices to reduce emissions of methane. In conclusion, a C&T regime in the natural gas sector, at least as it applies to LDCs, will likely just add additional costs and complexity to achieve the same level of reductions.

Reductions can, however, be economically achieved through end-use customer conservation and energy efficiency. The Joint Commissions, in conjunction with the ARB, could mandate the implementation of energy efficiency appliance and retrofit programs for existing end-use customers, which will provide the same emissions reductions at a lower cost. However, if a C&T regulatory regime is ultimately adopted by the ARB for the natural gas sector,

provisions should be made to allocate (at no cost) GHG allowances to utilities serving end-use customers, as the customers will ultimately bear all costs of compliance.

It is important to note, fugitive emissions of GHGs by natural gas utilities are minimal and their reduction will not have any meaningful impact on total GHG emissions level reductions. In addition, there is little, if any, direct action an LDC can take to reduce the GHG emissions from that source. All regulated utilities should continue to participate in the California Climate Action Registry (CCAR) or successor regional or national registry and file annual inventory management plans to be verified by an approved and independent third party. These plans could contain detailed information to continually validate the small contribution of GHG emissions generated by utility operations (including LDCs).

Southwest would also like to point out that large end-use or non-core customers like transportation customers, electric generators, Combined Heat and Power (CHP) customers and large industrial process customers should be regulated separately from the LDCs, that is, as part of the electric sector (for electric generation and CHP customers), or through the marketer/third-party that provides the gas, or as a separate point of regulation in the natural gas sector. Natural gas utilities should not be responsible for end-use customers who do not buy their gas from the natural gas utility.

Finally, Southwest believes careful consideration should be given to deferring any final regulations implementing a C&T program until regional and/or national GHG emissions reduction programs are explored. Southwest believes a mandatory market-based system, such as a C&T program, would benefit from being implemented on a more holistic and more broadly dispersed geographic basis. This would achieve greater overall GHG emissions reductions, reduce the possibility of leakage, and minimize potential legal implications. On the other hand, regulation of the natural gas sector through mandated energy efficiency and conservation programs for end-users could be undertaken immediately. These energy

efficiency/conservation programs could begin achieving real GHG emissions reductions in California pending any final resolution of a comprehensive C&T program for the electric sector.

### **3.6 *Relationship to GHG Regulatory Approach in the Electricity Sector***

Southwest believes the natural gas sector can be regulated differently than the electricity sector, in that the focus will be on natural gas end-users in California (excluding electric generators and CHP). Again, mandated energy efficiency programs that are approved, monitored, and evaluated by the Joint Commissions will meet the objectives of reducing energy and lowering GHG emissions.

In a broader view, there may be instances where fuel switching, combined heat and power and/or distributed generation could increase the use of natural gas, but the end result would be lower total energy use and GHG emissions. These types of activities should be evaluated to determine the trade-off of increased natural gas usage versus the decreased electric usage in combination with the associated emission savings.

### **3.7 *Recommendation and Comparison of Alternatives***

Southwest continues to emphasize that GHG emissions from the combustion of natural gas by end-use customers is significantly greater than the fugitive emissions of GHGs by LDCs in their system operations. As such, there is little, if any, direct action an LDC can take itself to reduce the GHG emissions from that source. Thus, a reasonable method of reducing natural gas end-users' GHG emissions is to reduce the amount of natural gas they actually consume. This can be accomplished through energy efficiency programs, without the need for a C&T system in the natural gas sector.

## **CONCLUSION**

Southwest believes that the Joint Commissions, in their recommendations to the ARB, should: (1) exempt the natural gas utility sector from regulation under a C&T regulatory regime; (2) use energy efficiency programs focused on end-users to reach GHG emission saving goals

from the natural gas sector; and (3) for administrative simplicity and accuracy, seek only to regulate GHG produced within the State of California.

Southwest appreciates the opportunity to comment and participate in this matter. Southwest looks forward to continuing to work with the Commissions and the other parties in this proceeding to develop reasonable policy recommendations leading to fair and reasonable regulation for the reduction of greenhouse gas emissions in the natural gas sector.

Dated this 17<sup>th</sup> day of December, 2007 at Las Vegas, Nevada.

Respectfully submitted,  
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### **Certificate of Service**

I certify that I have by mail, or by electronic mail, to the parties to which an electronic mail address has been provided, this day served a true copy of the **COMMENTS OF SOUTHWEST GAS CORPORATION (U 905 G) ON TYPE AND POINT OF REGULATION ISSUES FOR NATURAL GAS UTILITIES** on the attached service list to R.06-04-009.

Dated this 17<sup>th</sup> day of December, 2007, at Las Vegas, Nevada.

/s/ Telma G. Lopez  
An employee of Southwest Gas Corporation

**R.06-04-009**  
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**Last Updated: December 13, 2007**

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